REMARKS

Reconsideration of this application, as amended, is respectfully requested.

Claims 1, 2, 6-12 and 15-17 are pending. Claims 1, 2, 6-12 and 15-17 stand rejected.

In this response, claims 1, 7, and 10 have been amended. No claims have been canceled. No claims have been added. Support for the amendments is found in the specification, the drawings, and in the claims as originally filed. Applicant submits that the amendments do not add new matter.

Applicant reserves all rights with respect to the applicability of the Doctrine of Equivalents.

The Examiner stated that "the amendment to apparatus claims 7 and 10 do not affect the scope of the claims because they do not structurally differentiate the claimed invention over the prior art....To overcome these issues, Applicant... may ... include web routers that comprise storage means for storing the WILD update message... " (Office Action, pp. 2-4).

Applicants have amended claims 7 and 10 in light of the Examiner's suggestion. Applicants have amended claim 7 to "An information object repository comprising a Web router ... the Web router executing a Web Information Locator by Distance (WILD) communication protocol to communicate with neighboring Web routers... wherein the Web router comprises storage means for storing a WILD update message for communicating mappings of client address ranges to the neighboring routers, wherein the WILD update message comprises a basic routing update, a list of type-of-service distances from the Web caches to destinations, and a list of type-of-service distances from the redirecting Web routers to the destinations."

Applicants have amended claim 10 to "A network, comprising:... a Web router ... the Web router executing a Web Information Locator by Distance (WILD) communication protocol to communicate with neighboring Web routers... wherein the Web router comprises storage

means for storing a WILD update message for communicating mappings of client address ranges to the neighboring routers, wherein the WILD update message comprises a basic routing update, a list of type-of-service distances from the Web caches to destinations, and a list of type-of-service distances from the redirecting Web routers to the destinations."

Claims 1, 7 and 10 stand rejected under 35 U.S.C. §112, first paragraph. The Examiner stated that "... 'mapping an address of a client to one or more addresses of information object repositories and to one or more addresses of routers that have a best type-of-service distance to the address of the client.' There is no description in Applicant's specification of this feature." (Office Action, p. 5).

Applicants have amended claim 1 to "executing a Web Information Locator by Distance (WILD) communication protocol that runs on top of a Transmission Control Protocol (TCP) to map an address of a client to one or more addresses of Web caches or a content server that has a best type-of-service distance to the address of the client and to one or more addresses of redirecting Web routers that have the best type-of-service distance to the address of the client."

Applicants respectfully submit that there is support under 35 U.S.C. §112, first paragraph, in the specification for amended claim 1. The specification discloses the following:

> Web routers may execute WILD (or another protocol) to map the address of a client into: (a) one or more addresses of Web caches of the content server that has the best TOS distance to the client address, and (b) one or more addresses of redirecting Web routers that have the best TOS distance to the client address. In some cases, this mapping is done independently or regardless of whether the Web cache or content server maintains a local copy of any of the information objects required by the client (the idea being that the content can be brought to the cache afer the client has been advised of the "best" or "preferred" cache to connect to).

(paragraph [0068]) (emphasis added)

Therefore, applicants respectfully submit that the Examiner's rejection of claim 1, as amended, under 35 U.S.C. §112, first paragraph, has been overcome.

Given that claims 7 and 10 contain limitations that are similar to those limitations set forth above with respect to amended claim 1, applicants respectfully submit that the Examiner's rejections of claims 7 and 10, as amended, under 35 U.S.C. §112, first paragraph, have been overcome.

Claims 1, 7 and 10 stand rejected under 35 U.S.C. §112, second paragraph. The Examiner stated that "Applicant should amend the claims to more clearly recite that the repositories also have a best TOS distance to the client's address." (Office Action, p. 6).

Applicants have amended claim 1 to "an address of a client to one or more addresses of Web caches or a content server that has a best type-of-service distance to the address of the client." (emphasis added).

Therefore, applicants respectfully submit that the Examiner's rejection of claim 1, as amended, under 35 U.S.C. §112, second paragraph, has been overcome.

Given that claims 7 and 10 contain limitations that are similar to those limitations set forth above with respect to amended claim 1, applicants respectfully submit that the Examiner's rejections of claims 7 and 10, as amended, under 35 U.S.C. §112, second paragraph, have been overcome.

Claims 1, 2, 6, and 16 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,415,323 to McCanne et al. ("McCanne") in view of U.S. Patent No. 6,314,088 to Yamano ("Yamano"), in further view of U.S. Patent No. 6,529,939 to Kraft ("Kraft") in further view of U.S. Patent No. 6,820,133 to Grove et al. ("Grove") in further view of U.S. Patent No. 6,687,731 to Kavak et al. ("Kavak").

Applicants reserve the right to swear behind McCanne.

The Examiner stated that "subject matter found in Applicant's provisional application 60/200401, which if incorporated into the independent claims would likely distinguish the claims

over the prior art. Specifically, at pages 21-22, the provisional describes a WILD update message that is used for communicating the mappings of client address ranges to neighboring routers, where the WILD update message contains three components: (1) a basic routing update; (2) a list of TOS distances from the Web caches to destinations, and (3) a list of type-of-service distances from the redirecting Web routers to destinations." (Office Action, p. 4, Allowable Subject Matter).

The applicants have amended claim 1 to include "receiving a first request for an information object at an anycast address of a network, wherein the request is received at an information object repository selected according to specified performance metrics by executing a Web Information Locator by Distance (WILD) communication protocol that runs on top of a Transmission Control Protocol (TCP) to map an address of a client to one or more addresses of Web caches or a content server that has a best type-of-service distance to the address of the client and to one or more addresses of redirecting Web routers that have the best type-of-service distance to the address of the client, wherein the WILD protocol comprises a WILD update message for communicating mappings of client address ranges to neighboring Web routers, wherein the WILD update message comprises a basic routing update, a list of type-of-service distances from the Web caches to destinations, and a list of type-of-service distances from the redirecting Web routers to the destinations."

It is respectfully submitted that none of the references cited by the Examiner teach or suggest a combination with each other. It would be impermissible hindsight, based on applicants' own disclosure, to combine McCanne, Yamano, Kraft, Grove, and Kavak.

Furthermore, even if McCanne, Yamano, Kraft, Grove, and Kavak were combined, such a combination would still lack executing a Web Information Locator by Distance (WILD) communication protocol that runs on top of a Transmission Control Protocol (TCP) to map an

address of a client to one or more addresses of Web caches or a content server that has a best type-of-service distance to the address of the client and to one or more addresses of redirecting Web routers that have the best type-of-service distance to the address of the client, wherein the WILD protocol comprises a WILD update message for communicating mappings of client address ranges to neighboring Web routers, wherein the WILD update message comprises a basic routing update, a list of type-of-service distances from the Web caches to destinations, and a list of type-of-service distances from the redirecting Web routers to the destinations, as recited in amended claim 1.

Therefore, applicants respectfully submit that claim 1, as amended, is not obvious under 35 U.S.C. § 103(a) over McCanne, in view of Yamano, Kraft, Grove and Kavak and is now allowable.

Given that claims 2, 6-12, 15 and 16 contain limitations that are similar to those discussed with respect to amended claim 1, applicants respectfully submit that claims 2, 6-12, 15 and 16 are not obvious under 35 U.S.C. § 103(a) over McCanne, in view of Yamano, in further view of Kraft, in further view of Grove and in further view of Kavak.

Claims 7, 8, 10, 11 and 15 stand rejected under 35 U.S.C. §103(a) as being unpatentable over McCanne, in view of Yamano, in further view of Grove.

Applicants have amended claim 7 to read as follows: "An information object repository comprising a Web router configured to resolve a network layer anycast address of a network to a network layer unicast address in response to a first request for an information object at the network layer anycast address, wherein resolving the network layer anycast address includes transmitting a second request to the anycast address in response to the first request, to obtain a copy of the information object at the network layer unicast address, and to receive an anycast resolution response in response to the second request to resolve the network layer anycast

address, wherein the information object repository is selected according to specified performance metrics by the Web router executing a Web Information Locator by Distance (WILD) communication protocol to communicate with neighboring Web routers that runs on top of a Transmission Control Protocol (TCP) to map an address of a client to one or more addresses of Web caches or a content server that has a best type-of-service distance to the address of the client and to one or more addresses of redirecting Web routers that have the best type-of-service distance to the address of the client, wherein the Web router comprises storage means for storing a WILD update message for communicating mappings of client address ranges to the neighboring routers, wherein the WILD update message comprises a basic routing update, a list of type-of-service distances from the Web caches to destinations, and a list of type-of-service distances from the redirecting Web routers to the destinations, wherein the second request to resolve is a single IP packet that includes the network layer anycast address, wherein the anycast resolution response is a single IP packet that includes the network layer unicast address."(emphasis added).

The Examiner noted that if " a WILD update message…." were "incorporated into the independent claims", it "would likely distinguish the claims over the prior art." (Office Action, p. 4, Allowable Subject Matter).

Therefore, applicants respectfully submit that claim 7, as amended, is now allowable.

It is respectfully submitted that none of the references cited by the Examiner teach or suggest a combination with each other. It would be impermissible hindsight, based on applicants' own disclosure, to combine McCanne, Yamano, and Grove.

Furthermore, even if McCanne, Yamano, and Grove were combined, such a combination would still lack the Web router executing a Web Information Locator by Distance (WILD) communication protocol that runs on top of a Transmission Control Protocol (TCP) to map an

address of a client to one or more addresses of Web caches or a content server that has a best type-of-service distance to the address of the client and to one or more addresses of redirecting Web routers that have the best type-of-service distance to the address of the client, wherein the Web router comprises storage means for storing a WILD update message for communicating mappings of client address ranges to neighboring Web routers, wherein the WILD update message comprises a basic routing update, a list of type-of-service distances from the Web caches to destinations, and a list of type-of-service distances from the redirecting Web routers to the destinations, as recited in amended claim 7.

Therefore, applicants respectfully submit that claim 7, as amended, is not obvious under 35 U.S.C. § 103(a) over McCanne, in view of Yamano, and Grove and is now allowable.

Given that claims 8, 10, 11 and 15 contain limitations that are similar to those discussed with respect to amended claim 7, applicants respectfully submit that claims 8, 10, 11 and 15 are not obvious under 35 U.S.C. § 103(a) over McCanne, in view of Yamano, in further view of Grove.

Claims 9 and 12 stand rejected under 35 U.S.C. §103(a) as being unpatentable over McCanne, in view of Yamano, in further view of Grove, in further view of Kraft.

The Examiner noted that if " a WILD update message…." were "incorporated into the independent claims", it "would likely distinguish the claims over the prior art." (Office Action, p. 4, Allowable Subject Matter).

Amended claim 9 includes "a Web router, wherein the information object repository is selected according to specified performance metrics by the Web router executing a Web Information Locator by Distance (WILD) communication protocol to communicate with neighboring Web routers that runs on top of a Transmission Control Protocol (TCP) to map an address of a client to one or more addresses of Web caches or a content server that has a best

type-of-service distance to the address of the client and to one or more addresses of redirecting Web routers that have the best type-of-service distance to the address of the client, wherein the Web router comprises storage means for storing a WILD update message for communicating mappings of client address ranges to the neighboring routers, wherein the WILD update message comprises a basic routing update, a list of type-of-service distances from the Web caches to destinations, and a list of type-of-service distances from the redirecting Web routers to the destinations."

Therefore, applicants respectfully submit that claim 9, as amended, is now allowable.

It is respectfully submitted that none of the references cited by the Examiner teach or suggest a combination with each other. It would be impermissible hindsight, based on applicants' own disclosure, to combine McCanne, Yamano, Grove, and Kraft.

Furthermore, even if Kraft, McCanne, Yamano, and Grove were combined, such a combination would still lack the Web router executing a Web Information Locator by Distance (WILD) communication protocol that runs on top of a Transmission Control Protocol (TCP) to map an address of a client to one or more addresses of Web caches or a content server that has a best type-of-service distance to the address of the client and to one or more addresses of redirecting Web routers that have the best type-of-service distance to the address of the client, wherein the Web router comprises storage means for storing a WILD update message for communicating mappings of client address ranges to neighboring Web routers, wherein the WILD update message comprises a basic routing update, a list of type-of-service distances from the Web caches to destinations, and a list of type-of-service distances from the redirecting Web routers to the destinations, as recited in amended claim 9.

Therefore, applicants respectfully submit that claim 9, as amended, is not obvious under 35 U.S.C. § 103(a) over McCanne, in view of Yamano, Kraft, and Grove and is now allowable.

Given that claim 12 depends from amended claim 10, applicants respectfully submit that claim 12 is not obvious under 35 U.S.C. § 103(a) over McCanne, in view of Yamano, in further view of Kraft, in further view of Grove and is now allowable.

Given that claim 17 depends from amended claim 10, and add additional limitations, applicants respectfully submit that claim 17 is not obvious under 35 U.S.C. § 103(a) over McCanne, in view of Yamano in further view of Grove, in further view of Kraft and is now allowable.

Claim 17 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over McCanne, Yamano, and Grove, in further view of U.S. Patent No. 6,611,872 to McCanne ("McCanne.2").

Given that claim 17 depends from amended claim 10, for at least the reasons set forth above with respect to amended claim 10, applicants respectfully submit that claim 17 is not obvious under 35 U.S.C. § 103(a) over McCanne, Yamano, Grove, and further in view of McCanne.2 and is now allowable.

It is respectfully submitted that in view of the amendments and arguments set forth herein, the applicable rejections and objections have been overcome. If the Examiner believes a telephone conference would expedite the prosecution of the present application, the Examiner is invited to call the undersigned at (408) 720-8300.

If there are any additional charges, please charge Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: September 14, 2009 By: /Tatiana Rossin/
Tatiana Rossin
Reg. No. 56,833

1279 Oakmead Parkway
Sunnyvale, California 94085-4040
(408) 720-8300

Customer No. 008791